

**Counsel's Rule 11 Compliance Certification – Reply to Motion for Summary Judgment**

By signing this Rule 11 Compliance Certification, I attest that I have completed the following actions before filing the reply in support of the motion for summary judgment filed contemporaneously with this Certification. I understand that the failure to complete the following actions before persisting in pursuit of summary judgment could subject me to sanctions pursuant to Rule 11 of the Federal Rules of Civil Procedure and other applicable law.

- I have carefully read the plaintiff's response and all evidence submitted by the plaintiff at any time in this action, including any sworn response or sworn pleading;
- In light of the plaintiff's response and evidence, I conducted a further reasonable investigation into any factual contentions in the reply as required by Rule 11(b)(3);
- I reviewed the legal standards governing a motion for summary judgment, including that summary judgment is only warranted if there is no genuine issue of material fact and that the Court must view the evidence in the light most favorable to the nonmovant and drawing all reasonable inferences in the nonmovant's favor;
- Given the evidence present by the plaintiff and the legal standards governing summary judgment, I considered whether there remains a basis to continue to pursue summary judgment consistent with Rule 11(b)(2).

- I understand that the Court expects the reply to demonstrate that no genuine issues of material fact exists by directly confronting the evidence presented by the plaintiff to dispute evidence presented by the defendant(s) and explaining why, despite the plaintiff's evidence, there remain no genuine issues of material fact.
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Signature: